

John E. Benedict

Vice President
Federal Regulatory Affairs & Regulatory Counsel
1099 New York Avenue NW, Suite 250
Washington, DC 20001
202-429-3114

VIA ECFS

NOTICE OF EX PARTE

July 28, 2016

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re: Rates for Interstate Inmate Calling Services, WC Docket No. 12-375

Dear Ms. Dortch:

On July 28, 2016, Melissa Newman and Jeb Benedict of CenturyLink met with Stephanie Weiner, Legal Advisor to Chairman Wheeler, Claude Aiken, Legal Advisor to Commissioner Clyburn, and Madeleine Findley of the Wireline Competition Bureau. At the meeting, CenturyLink discussed the Fact Sheet released by the FCC summarizing an Order on Reconsideration concerning rate caps for interstate and intrastate inmate calling services to be considered by the Commission at its August 4, 2016 meeting.

CenturyLink noted that it recognizes the value of inmate calling in keeping families connected and has supported reasonable reform efforts to benefit consumers. However, it explained that the Fact Sheet's rate cap for prisons remains legally deficient in light of the demonstrated costs of providing service at some institutions, even without applying commissions that may be required by state law or contract. CenturyLink said a cap for prisons should be no lower than for large jails, and any rules should provide a waiver for higher rates due to commissions mandated by state law.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this letter is being filed in the appropriate docket.

Sincerely,

/s/ John E. Benedict

Copy via email to:

Stephanie Weiner Claude Aiken Madeleine Findley